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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

Adv. Pro. No. 08-1789 (SMB)

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC

Adv. Pro. No. 10-04885 (SMB)

Plaintiff,

v.

TRUST FUND B U/W EDWARD F. SELIGMAN F/B/O NANCY ATLAS and NANCY ATLAS, in her capacity as the Trustee and Beneficiary of the Trust Fund B U/W Edward Seligman F/B/O Nancy Atlas,

Defendants.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Helen Davis Chaitman and Julie Gorchkova, attorneys of the firm Becker & Poliakoff LLP ("Becker & Poliakoff"), appear as attorneys in this adversary proceeding (the "Adversary Proceeding") on behalf of TRUST FUND B U/W EDWARD F. SELIGMAN F/B/O NANCY ATLAS and NANCY ATLAS, in her capacity as the Trustee and Beneficiary of the Trust Fund B U/W Edward Seligman F/B/O Nancy Atlas (the "Defendants"). Pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") 2002, 9007 and 9010, Becker & Poliakoff requests that copies of all notices and pleadings in the Adversary Proceedings be served upon the persons listed below at the following address:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, telex, or otherwise filed or made with regard to the Adversary Proceedings and matters therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers is not, and shall not be deemed or construed to be: (1) a consent to the personal jurisdiction of the Bankruptcy Court; (2) a waiver of the right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (3) a waiver of the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (4) a waiver of the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (5) a waiver of any other rights, claims, actions, defenses, setoffs, or recoupments to which Defendants are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Defendants expressly reserve.

September 9, 2015

## **BECKER & POLIAKOFF LLP**

By: /s/ Helen Davis Chaitman

By: /s/ Julie Gorchkova

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Atlas

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**CERTIFICATE OF SERVICE** 

I, Lourdes Blanco, hereby certify that I caused a true and correct copy of the foregoing

document(s) to be served upon the parties in this action who receive electronic service through

CM/ECF. I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 9, 2015

/s/ Lourdes Blanco